

**FILED**

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT  
ALBUQUERQUE, NEW MEXICO

## UNITED STATES DISTRICT COURT

for the

JUN 02 2016

District of New Mexico

MATTHEW J. DYKMAN  
CLERKUnited States of America  
v.

Case No.

16mj 2569

Jason Blackwood  
Year of Birth: 1972  
SSAN: 5378

Defendant(s)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 06/01/2016 in the county of Bernalillo in the  
District of New Mexico, the defendant(s) violated:

Code Section

Offense Description

18:2113

Bank Robbery

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Complainant's signature

SPECIAL AGENT PETER JON N. UEBELOHDE

Printed name and title

Sworn to before me and signed in my presence.

Date: 06/02/2016City and state: Albuquerque, New Mexico  
Laura Fasching, U.S. Magistrate Judge

Judge's signature

Printed name and title

**AFFIDAVIT OF PETER JON N. UBBELOHDE**

Your Affiant, Peter Jon N. Ubbelohde, having been first duly sworn, does hereby depose and state as follows:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI), United States Department of Justice. I have been so employed since June 2015. I am therefore authorized to investigate federal criminal offenses. I am currently a member of the Violent Crimes Squad of the Albuquerque Division of the FBI and as such have participated in investigations of suspected violations of federal bank robbery laws, including Title 18, United States Code (USC), Section (§) 2113. The information set forth in this affidavit has been derived from my own investigation or communicated to me by other sworn law enforcement officers or from reliable sources.
2. This affidavit will show there is probable cause in support of a criminal against Jason Blackwood (year of birth 1972, SSN xxx-xx-5378), for a violation of 18 USC § 2113, that being bank robbery.
3. The statements contained in this affidavit are based upon your Affiant's investigation, training and experience and information provided by other law enforcement officers. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, your Affiant has not included each and every fact known to your Affiant concerning this investigation. Your Affiant has set forth only the facts which your Affiant believes are necessary to establish probable cause to support a criminal complaint and arrest warrant against Jason Blackwood, in violation of 18 USC § 2113.
4. This investigation concerns an alleged violation of 18 USC § 2113.

5. 18 USC § 2113 prohibits taking, by force and violence or by intimidation, money in the possession of a bank or credit union.
6. On June 01, 2016, at approximately 1:02 p.m., a white male subject entered the Bank of the West, 780 Juan Tabo Blvd NE, Albuquerque, New Mexico (NM) 87123. Based upon witnesses' descriptions and surveillance camera images, the subject was a white male in his mid thirties, approximately 5'9" tall, with heavy to medium build. He wore a blue shirt, dark blue hooded jacket, tan baseball hat with New York Yankees logo, dark pants, dark shoes, and wore dark framed sunglasses. He had short brown hair and a beard. He carried a dark bag and what appeared to be a silver colored handgun. The subject made eye contact with each employee.
7. As the subject approached the station of the victim teller, he produced what appeared to be a small silver colored handgun from his bag and made an inaudible demand. The teller understood the subject wanted currency from him pointing the handgun at her. The teller complied with the subject's request and placed United States currency including nine bait bills and a tracking device from her top drawer into the subject's bag. The subject continued to point the gun at her and stated that he knew she had more money and demanded United States currency from the "second drawer" The teller complied and placed money from the second drawer into the subject's bag. The subject took the money and departed from the bank on foot. An audit as conducted by Bank of the West showed the bank suffered a loss of \$12,347.00 United States dollars during the robbery.
8. The Bank of the West, using equipment to locate the tracking device, led Albuquerque Police Department (APD) units to a residence at 524 Humbolt Street SE, Albuquerque NM 87123. The Albuquerque Police Department (APD) dispatched Investigative Service

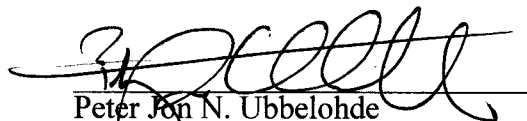
Unit (ISU) to the residence at 524 Humbolt Street SE, Albuquerque NM 87123 and began tracking the device. ISU established surveillance of the residence.

9. On 06/01/2015 at approximately 3:25p.m. ISU observed the subject leave the residence at 524 Humbolt Street SE, Albuquerque NM 87123 and depart in a dark colored Honda with California plate's # 6LZB596. ISU followed the subject to 329 Tennessee St. Ne Albuquerque, NM 87108. APD Detective and FBI Special Agent detained the subject and identified him as Jason Blackwood. The subject was searched for weapons and had on his person five \$20 bills in United States currency. APD detective observed on the back seat a baseball hat matching the description of the hat worn during the robbery. The subject stated he owned the hat and he recently got it at the community center near his home. At this time the subject was clean shaven and had a shaved head.
10. FBI Special Agents compared the currency taken from the subject and the bait bills. Of all the currency taken from the search of Blackwood five of the nine bait bills given by the victim teller were recovered. The bait bills' serial numbers were compared with serial numbers listed on the Bait List Log, and the serial numbers matched.
11. On 06/01/2016 ISU observed S.B., the subject's mother, leaving the residence at 524 Humbolt Street SE, Albuquerque NM 87123. APD detective and FBI Special Agent interviewed the subject's mother. She stated they had recently relocated to NM from California and were guests of the homeowner P.H.. S.B. stayed in a room, but the subject was sleeping on a couch in a common area. She normally sleeps during the day because she works nights, but at about 1:30p.m. the subject came home and woke her. She said the subject had been growing his hair and beard, but was now clean shaven.

12. On 06/01/2016, FBI Special Agents contacted P.H. She last saw the subject at about 10:00 or 10:30a.m. that morning and at that time he had hair and a beard.
13. She consented to allow FBI Agents, to conduct a search at her home residence for items connected to the bank robbery. She indicated her consent by signing a FD – 26 Consent to Search form. During that search FBI Special Agents found in the laundry room a black zippered computer bag, consistent with the bag described by the victim teller. The bag was opened and contained a large amount of United States currency, much of which was strapped with wrappers similar to those used by banks. A preliminary count of United States currency recovered totals \$11,658.00 United States dollars.
14. Bank of the West's deposits are insured by the Federal Deposit Insurance Corporation and it is therefore a bank as defined under 18 USC § 2113. Bank of the West suffered a financial loss in the robbery.
15. The aforementioned branch of Bank of the West is located in Bernalillo County, NM.
16. Based on the aforementioned facts, there is probable cause to believe that Jason Blackwood robbed the aforementioned branch of Bank of the West, in violation of 18 USC § 2113.

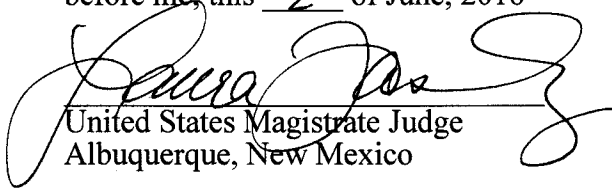
I swear that this information is true and correct to the best of my knowledge, information and belief.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "P. Ubbelohde", written over a horizontal line.

Peter Jon N. Ubbelohde  
Special Agent  
Federal Bureau of Investigation

Subscribed to and sworn to  
before me, this 2<sup>nd</sup> of June, 2016

  
United States Magistrate Judge  
Albuquerque, New Mexico